

March 8, 2006

Mr. James Ricks, SFD-8-1  
EPA Work Assignment Manager  
U.S. Environmental Protection Agency, Region IX  
75 Hawthorne Street  
San Francisco, CA 94105

**Subject: Contract No. 68-W-02-052 / WA No. 052-19-09P3  
Hunters Point Shipyard Work Assignment, Review of the Revised Final  
Basewide Radiological Removal Action, Action Memorandum, Hunters Point  
Shipyard, San Francisco, California, February 2006**

Dear Mr. Ricks:

Enclosed please find TechLaw's Review of the Revised Final Basewide Radiological Removal Action, Action Memorandum, Hunters Point Shipyard, San Francisco, California, dated February 14, 2006 (the 2006 Action Memorandum). As part of our review, we compared the 2006 Action Memorandum to the 2001 version of this document.

These comments are being forwarded to you through electronic mail (via Internet) in WordPerfect® Version 11 format. A hard copy of these comments will also be submitted with this cover letter. TechLaw understands you will review and augment the comments at your discretion.

Thank you for the opportunity to provide the U.S. EPA with technical oversight services for Hunters Point Shipyard. Should you have any questions or comments, please contact the TechLaw Site Manager, Karla Brasaemle, at (415) 281-8730, extension 12.

Sincerely,

Indira G. Balkissoon  
Regional Manager

KB:LK:RH:cl

cc: Patricia Brown-Derocher/Central Files, TechLaw, Inc.  
Mr. Michael Work, USEPA

**Review of the Revised Final Basewide Radiological Removal Action, Action Memorandum,  
Hunters Point Shipyard, San Francisco, California, February 2006**

**SPECIFIC COMMENTS**

1. **Section II.A.2, Physical Location, Page 2:** Since the conveyance of Parcel A to the City of San Francisco, Hunters Point Shipyard (HPS) is no longer 936 acres. Please update the text to reflect the current size of HPS.
2. **Section II.A.4, Release or Threatened Release into the Environment of a Hazardous Substance or Pollutant or Contaminant, Page 3:** It is unclear why daughter products are no longer listed; the 2001 Action Memorandum included “cesium-137 (and daughter products)” and “uranium-235 (and daughter products).” In addition, it appears that text is missing from the first paragraph since there are two “and” statements. Please include daughter products or explain why they have been dropped from the 2006 Action Memorandum. Also, please revise the first paragraph for clarity.
3. **Section II.A.5, National Priorities List Status, Page 3:** The text does not reflect the most current CERCLA status of Parcel B, specifically that the Feasibility Study is being redone so that the Record of Decision can be amended. Please update the status of Parcel B.
4. **Section V.A, Proposed Action, Page 10:** The last paragraph states, “Table 3 does not include those sites that were in the former Parcel A,” but it is unclear if this statement refers to the former Building 322, which was demolished, or if it refers to radiologically impacted sites for which parcel boundaries were readjusted to move them out of Parcel A. It is also possible that the community and others could read this paragraph and conclude that there are still radiologically impacted sites in Parcel A. Please revise this paragraph to clarify whether there are still radiologically impacted sites in Parcel A and to discuss the fact that the Parcel A boundary was adjusted to move radiologically impacted sites into other parcels.
5. **Section V.B, Estimated Costs, Page 15:** The costs are the same as those in the 2001 plan, but there has been inflation and the cost of construction materials has increased. Please update the cost estimate to reflect 2006 costs.
6. **Table 1, Release Criteria:** During the recent Base Realignment and Closure (BRAC) Cleanup Team (BCT) meeting, the Navy agreed to update the release criteria for Cesium-137 to reflect the current preliminary remediation goal (PRG) of 0.113 picoCuries per gram (pCi/g). Please update this table with the PRG for Cesium-137.
7. **Figure 2, Base-Wide Impacted Buildings, Sites, Sanitary and Storm Drain Sewer Systems:** It is unclear why the figure does not include IR-02 Northwest and Central (the Radium Dial Disposal Area) and the Metal Slag area in the IR-01 panhandle, since

radiological removal actions are still being done at these sites. Please include IR-02 Northwest and Central and the Metal Slag Area on Figure 2.